

HARRIS
ST. LAURENT

June 3, 2020

BY ECF

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. David Wagner, et. al., 19-cr-437 (AKH)

Dear Judge Hellerstein:

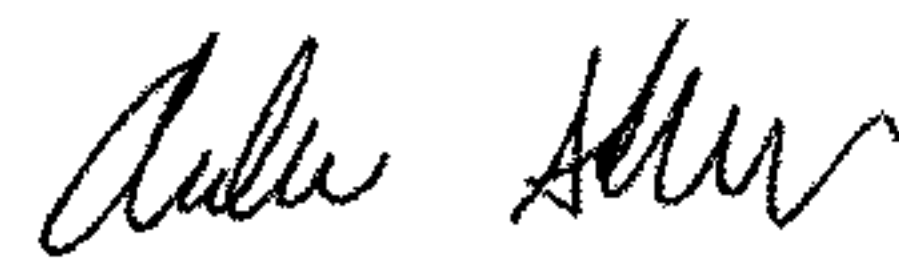
My firm represents defendant Marc Lawrence in this matter.

By way of background, on August 1, 2019 (Docket No. 31), this Court approved Mr. Lawrence's release on a \$500,000 personal recognizance bond co-signed by three financially responsible persons, each of whom had been interviewed and approved by the Government.

One of the three co-signers on the personal recognizance bond, Kelleen Schuster, has informed the government that she no longer wishes to serve as a co-signer on the bond. We have discussed the matter with the government (AUSA Jilan Kamal and AUSA Sagar Ravi). All parties consent to have Ms. Schuster released from the bond. We further agreed that Mr. Lawrence will use his best efforts to find a third signatory over the next two weeks.

For the foregoing reasons, we respectfully request the Court relieve Ms. Schuster of her responsibilities as a co-signer on Mr. Lawrence's personal recognizance bond and allow Mr. Lawrence to remain at liberty with two co-signers pending the results of Mr. Lawrence's search for another financially responsible person. Mr. Lawrence will update the Court concerning such a person no later than June 17th.

Respectfully,



Andrew St. Laurent

cc: AUSA Jilan Kamal, Esq. (by ECF)
AUSA Sagar Ravi, Esq. (by ECF)

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